UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re:

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EPIC Employee, LLC,
Bankruptcy No. 24-30282
EOLA Capital, LLC, and
EC West Fargo, LLC,
Debtors.

Debtors.

Chapter 11

FIFTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024

- 1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, "<u>Fredrikson</u>") make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the "<u>Debtors</u>") between December 1, 2024 and December 31, 2024 pursuant to 11 U.S.C. § 330.
 - 2. In support of this Application, Fredrikson respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors' address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the "Petition Date"). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

BACKGROUND

- 5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.
- 6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.
- 7. This is Fredrikson's fifth application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

Fee Application Amount	Date of Order Approving Fee Application	Docket No.
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$37,675.00	12/13/2024	182
\$42,291.00	1/15/2024	206
\$180,673.96		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

RELIEF REQUESTED

- 9. <u>Post-Petition Fees.</u> By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between December 1, 2024 and December 31, 2024 in the amount of \$33,948.00, and reimbursement of expenses in the amount of \$2,100.00, for a total of \$36,048.00.
- 10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

(5000) Case Administration: \$57.50

Services include reviewing orders reassigning adversary proceedings to different judge.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	0.1	2024	\$575	\$57.50
TOTAL	0.1			\$57.50

Blended Hourly Rate: \$575.00

(5001) Asset Analysis and Recovery: \$27,792.00

Services include meeting with the Chief Restructuring Officer ("<u>CRO</u>") to conduct asset analyses; drafting loan extension, forbearance, and subordination agreements; drafting and revising complaints against borrowers; meeting with counsel for borrowers; drafting default letters; and commencing adversary proceedings.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	30.0	2024	\$575	\$17,250.00
Katherine A. Nixon	25.1	2024	\$420	\$10,542.00
TOTAL	55.1			\$27,792.00

	Blended Hourly Rate:	\$504.39
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(5002) Asset Disposition: \$504.00

Services include drafting and finalizing notices of settlement with certain borrowers.

<u>Name</u>	<u>Hours</u>	Year	Hourly Rate	<u>Fees</u>
Katherine A. Nixon	1.2	2024	\$420	\$504.00
TOTAL	1.2			\$504.00

Blended Hourly Rate:	\$420.00
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(5007) Claims Administration and Objections: \$84.00

Services include reviewing and analyzing the claims register.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Shataia Stallings	0.4	2024	\$210	\$84.00
TOTAL	0.4			\$84.00

Blended Hourly Rate:	\$210.00
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(5010) Employment and Fee Applications: \$1,430.50

Services include drafting, revising, and finalizing Fredrikson's fourth fee application; reviewing orders approving fee applications; assisting in preparing and finalizing the CRO's fourth staffing report; and communicating with potential conflicts counsel regarding adversary proceedings.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	1.1	2024	\$575	\$632.50
Katherine A. Nixon	1.9	2024	\$420	\$798.00
TOTAL	3			\$1,430.50

Blended Hourly Rate:	\$476.83
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(5012) Financing and Cash Collateral: \$141.50

Services include reviewing orders approving cash collateral and discussing the same with the CRO.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	0.2	2024	\$575	\$84.00
Katherine A. Nixon	0.1	2024	\$420	\$57.50
TOTAL	0.3			\$141.50

Blended Hourly Rate: \$471.67

(5013) Meetings and Communications with Creditors: \$356.00

Services include communicating with various creditors and counsel for the official committee of unsecured creditors (the "Committee") regarding certain tax issues.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	0.4	2024	\$575	\$230.00
Katherine A. Nixon	0.3	2024	\$420	\$126.00
TOTAL	0.7			\$356.00

Blended Hourly Rate: \$508.57

(5018) Reporting: \$372.50

Services include emailing the CRO regarding monthly operating reports; assisting the CRO in finalizing monthly operating reports; and emailing counsel for the United States Trustee regarding bank records.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2024	\$575	\$57.50
Katherine A. Nixon	0.4	2024	\$420	\$168.00
Shataia Stallings	0.7	2024	\$210	\$147.00
TOTAL	1.2			\$372.50

Blended Hourly Rate: \$310.42

(0003) Adversary Proceeding Against Preference 42, LLC: \$42.00

Services include finalizing stipulation to extend the time to answer or otherwise respond to the complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.1	2024	\$420	\$42.00
TOTAL	0.1			\$42.00

Blended Hourly Rate:	\$420.00
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(0004) Adversary Proceeding Against Boulevard Square II, LLC et al.: \$871.00

Services include finalizing stipulation to extend the time to answer or otherwise respond to the complaint; drafting and revising motion for default judgment and preparing certificate of service for the same; reviewing answer to complaint filed by Boulevard Square III, LLC.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	0.2	2024	\$575	\$115.00
Katherine A. Nixon	1.7	2024	\$420	\$714.00
Shataia Stallings	0.2	2024	\$210	\$42.00
TOTAL	2.1			\$871.00

Blended Hourly Rate:	\$414.76
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(0005) Adversary Proceeding Against Pioneer Place, LLC: \$1,096.50

Services include drafting and revising motion for default judgment and preparing certificate of service for the same; and reviewing judgment entered.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2024	\$575	\$172.50
Katherine A. Nixon	2.1	2024	\$420	\$882.00
Shataia Stallings	0.2	2024	\$210	\$42.00
TOTAL	2.6			\$1,096.50

Blended Hourly Rate:	\$421.73
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(0006) Adversary Proceeding Against SAD Downtown, LLC: \$214.50

Services include finalizing stipulation to extend the time to answer or otherwise respond to the complaint and reviewing answer.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Steven R. Kinsella	0.3	2024	\$575	\$42.00
Katherine A. Nixon	0.1	2024	\$420	\$172.50
TOTAL	0.4			\$214.50

Blended Hourly Rate: \$536.25

(0007) Adversary Proceeding Against Greenfield Commons, LLC et al.: \$126.00

Services include finalizing stipulation to extend the time to answer or otherwise respond to the complaint and emailing counsel for the defendant regarding the same.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Katherine A. Nixon	0.3	2024	\$420	\$126.00
TOTAL	0.3			\$126.00

Blended Hourly Rate: \$420.00

(0008) Adversary Proceeding Against EPIC Holdings II, LLC: \$126.00

Services include coordinating service of the summons and complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.3	2024	\$420	\$126.00
TOTAL	0.3			\$126.00

Blended Hourly Rate: \$420.00

(0009) Adversary Proceeding Against U of J MU Jamestown, LLC: \$356.00

Services include communicating with the defendant and providing requested documents and information.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.4	2024	\$575	\$230.00
Katherine A. Nixon	0.3	2024	\$420	\$126.00
TOTAL	0.7			\$356.00

Blended Hourly Rate: \$508.57

(0010) Adversary Proceeding Against LTC-The Don, LLC: \$147.00

Services include coordinating service of the summons and complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2024	\$420	\$84.00
Shataia Stallings	0.3	2024	\$210	\$63.00
TOTAL	0.5			\$147.00

Blended Hourly Rate: \$294.00

(0011) Adversary Proceeding Against 36th and Veterans, LLC: \$147.00

Services include coordinating service of the summons and complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	Hourly Rate	<u>Fees</u>
Katherine A. Nixon	0.2	2024	\$420	\$84.00
Shataia Stallings	0.3	2024	\$210	\$63.00
TOTAL	0.5			\$147.00

Blended Hourly Rate: \$294.00

(0014) Adversary Proceeding Against EPIC Management, LLC: \$84.00

Services include coordinating service of the summons and complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly</u> <u>Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2024	\$420	\$84.00
TOTAL	0.2			\$84.00

Blended Hourly Rate: \$420.00

TOTAL POST-PETITION FEES: \$33,948.00

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter No. 5000 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>		<u>Amount</u>
Filing Fees for Adversary Proceedings		\$2,100.00
	TOTAL	\$2,100.00

TOTAL EXPENSES: \$2,100.00

- 12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.
- 13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

WHEREFORE, Fredrikson respectfully requests that the Court enter an order:

- A. Allowing Fredrikson's fees incurred between December 1, 2024 and December 31, 2024 in the amount of \$33,948.00, and expenses in the amount of \$2,100.00, totaling \$36,048.00;
- B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;
- C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and
 - D. Granting such other and further relief as may be just and proper.

Dated: January 16, 2025 /e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400 Fargo, ND 58102-4991 701.237.8200 mraum@fredlaw.com

Steven R. Kinsella (#09514)
Katherine A. Nixon (*pro hac vice* MN #0402772) **FREDRIKSON & BYRON, P.A.**60 South 6th Street, Suite 1500
Minneapolis, MN 55402-4400
612.492.7000
skinsella@fredlaw.com

skinsella@fredlaw.com knixon@fredlaw.com

ATTORNEYS FOR DEBTORS

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AFFIDAVIT

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare

under penalty of perjury that the foregoing Fifth Application of Fredrikson & Byron, P.A. for

Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from December 1, 2024

Through December 31, 2024 is true and correct according to the best of my knowledge,

information, and belief.

Dated: January 16, 2025

/e/ Steven R. Kinsella

Steven R. Kinsella

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EXHIBIT A

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CourtAlert® Case Management

From: ecf@ndb.uscourts.gov Sent: 7/25/2024 12:56:27 PM

To: nate_olson@ndb.uscourts.gov

Subject: Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to

Employ

CAUTION: EXTERNAL E-MAIL

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court

District of North Dakota

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

Case Name: EPIC Companies Midwest, LLC

Case Number: 24-30281

Document Number: 49

Docket Text:

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

24-30281 Notice will be electronically mailed to:

Douglas Christensen on behalf of Creditor Beth Holmes dougc@grandforkslaw.com, sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank john@kaler-doeling.com, janae@kaler-doeling.com

Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC knixon@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Richard P. Olson on behalf of Creditor Essential Living Inc rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Robert B. Raschke USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc. ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

24-30281 Notice will not be electronically mailed to:

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EXHIBIT B

UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re: Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,
Bankruptcy No. 24-30284
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors. Chapter 11

ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

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IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts

invoiced by Lighthouse Management Group, Inc. ("Lighthouse") for fees and expenses on a bi-

weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on

Debtors, the United States Trustee, and any statutory committee appointed in this case (the "Notice

Parties") a monthly staffing report, filed and served by the 20th of each month for the previous

month, identifying the Lighthouse employees who worked on this case, the total hours billed by

Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and

serve on the Notice Parties a quarterly compensation report by the 20th of each month following

the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports

will be deemed applications for interim compensation under sections 328 and 330. Parties in

interest may object to the reports within 21 days after notice. The Court will rule on the

applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved

among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and

to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.

SHON HASTINGS, JUDGE

Thon Hastings

UNITED STATES BANKRUPTCY COURT

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EXHIBIT C

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Invoice: 1901810 January 6, 2025 Invoice Date:

Client Number: 097807 **Matter Number:** 097807.5000

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Case Administration

Total for Current Legal Fees: \$ 57.50

Total For Current Costs and Other Charges: \$ 2,100,00

Total For Current Invoice: \$ 2,157.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

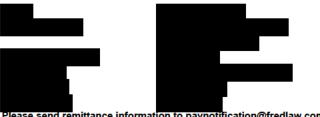
Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

Please remit this page with your payment. Thank you. We appreciate your business.

^{**} Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.*

Total Prior Balance:

Fredrikson

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Invoice: **Invoice Date:**

1901810 January 6, 2025

\$ 2,702.00

Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895306	2,702.00	_	2,702.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of January 6, 2025. If payment has been sent close to this date, please verify payment status.

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Invoice: 1901810 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.5000

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/04/24	S. Kinsella	Review orders reassigning adversary proceedings.	0.10	57.50
	Current Legal Fo	ees:	0.10	\$ 57.50

Timekeeper Summary

Timekeeper	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella	575.00	0.10	57.50
Total		0.10	\$ 57.50

Costs and Other Charges

		<u>Amount</u>
12/13/24	COURTS/USBCND-P - Complaint Filing Fee - A1592650	700.00
12/13/24	COURTS/USBCND-P - Complaint Filing Fee - A1592650	350.00
12/13/24	COURTS/USBCND-P - Complaint Filing Fees - A1592713	700.00
12/18/24	COURTS/USBC-ND-P - Complaint Filing Fee	350.00

Current Costs and Other Charges: \$ 2,100.00

Invoice Totals

Total for Current Legal Fees: \$ 57.50 Total For Current Costs and Other Charges: \$ 2,100.00

Total For Current Invoice: \$ 2,157.50

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Invoice: 1901811

January 6, 2025 Invoice Date: **Client Number:** 097807 **Matter Number:** 097807.5001

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Asset Analysis and Recovery

Total for Current Legal Fees:

\$27,792.00

Total For Current Invoice:

\$ 27,792.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Wire Instructions:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Fredlaw.com/payment

Online Payments:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

Please remit this page with your payment. Thank you. We appreciate your business.

^{**} Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.*

Fredrikson

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Invoice:

Invoice Date: Page:

1901811 January 6, 2025



Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895307	31,053.00		31,053.00

Total Prior Balance: \$ 31,053.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of January 6, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1901811

Invoice Date: January 6, 2025 097807 **Client Number: Matter Number:** 097807.5001

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	K. Nixon	Meeting with CRO regarding asset analysis.	0.50	210.00
12/02/24	S. Kinsella	Meeting with CRO regarding settlement proposals (.9); draft loan extension agreement (1.4); communications with counsel for project borrowers regarding settlement proposals (.8); review draft complaints (.6).	3.70	2,127.50
12/03/24	K. Nixon	Draft complaint(s) against borrowers.	5.40	2,268.00
12/03/24	S. Kinsella	Communications with project borrower and review stipulation and court procedure regarding proposal.	1.30	747.50
12/04/24	K. Nixon	Phone call with CRO re: complaints against borrower(s) (0.3); review additional information for complaints against borrower(s) (0.2); draft default letters to borrowers (0.9).	1.40	588.00
12/04/24	S. Kinsella	Prepare settlement agreement (.6); communications with CRO and project borrower regarding settlement terms (.7).	1.30	747.50
12/05/24	S. Kinsella	Prepare for and participate in meeting with CRO and project borrower (1.5); follow up call with CRO (.5); review complaints (.2).	2.20	1,265.00
12/05/24	K. Nixon	Finalize default letters to borrowers (0.5); draft complaint(s) against borrowers (1.8).	2.30	966.00
12/06/24	K. Nixon	Draft complaint(s) against borrowers.	0.80	336.00
12/06/24	S. Kinsella	Meeting with counsel for project borrower (.7); phone calls with CRO regarding the same (.6); communications with project borrower regarding settlement terms (.4); provide instruction regarding complaints (.2).	1.90	1,092.50
12/08/24	K. Nixon	Draft complaint(s) against borrowers.	3.50	1,470.00

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Fredrikson

Invoice: Invoice Date: Page:

1901811 January 6, 2025

12/09/24	S. Kinsella	Meeting with CRO regarding settlement negotiations and complaints (.7); communications with various counsel for project borrowers (.8); prepare letter regarding property sale and use of proceeds (.4); revise settlement agreement (.4).	2.30	1,322.50
12/09/24	K. Nixon	Meeting with CRO regarding asset analysis (0.5); revise and finalize complaint(s) for filing (1.9).	2.40	1,008.00
12/10/24	S. Kinsella	Prepare and revise settlement agreements (.7); phone call with counsel for project borrower regarding the same (.3); prepare letter regarding property sale (.2); respond to questions from counsel for project borrower (.2); phone call with CRO regarding status of the same (.4).	1.80	1,035.00
12/11/24	S. Kinsella	Draft subordination agreement (1.8); provide instruction regarding complaint (.2).	2.00	1,150.00
12/11/24	K. Nixon	Draft complaint(s) against borrowers and phone calls/emails with CRO re: the same.	1.80	756.00
12/12/24	S. Kinsella	Communications with project borrowers regarding settlement proposals.	0.40	230.00
12/12/24	K. Nixon	Revise draft complaint(s) against borrowers.	1.90	798.00
12/13/24	S. Kinsella	Communications with project borrower counsels regarding settlement proposals (.8); meeting with CRO regarding the same (.9); meeting with counsel for project borrower (.5).	2.20	1,265.00
12/13/24	K. Nixon	Revise complaint(s) against borrowers and finalize the same for filing.	1.30	546.00
12/16/24	S. Kinsella	Meeting with CRO (.5); prepare forbearance agreement (.5); communications with project borrower counsel (.2).	1.20	690.00
12/16/24	K. Nixon	Meeting with CRO regarding asset analysis.	0.50	210.00
12/17/24	S. Kinsella	Communications with counsel for project borrower (.1); draft intercreditor agreement (.2).	0.30	172.50
12/18/24	K. Nixon	Attention to service of summons and complaint. (HOLDINGS I)	0.30	126.00
12/18/24	K. Nixon	Finalize complaint for filing. (HI WEST)	0.20	84.00
12/18/24	S. Kinsella	Meeting with counsel for borrower (.5); follow up meeting with CRO (.3); continue to draft intercreditor agreement (1.1); communications with counsel for additional borrower (.3); phone call with CRO regarding same and new settlement proposal (.5)	2.70	1,552.50
12/19/24	K. Nixon	Attention to service of summons and complaint. (HI WEST)	0.20	84.00

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Invoice: Invoice Date: Page:

1901811 January 6, 2025

12/19/24	S. Kinsella	Review settlement agreement order (.2); finalize intercreditor agreement (.9).	1.10	632.50
12/20/24	K. Nixon	Review certificate of service. (HI WEST)	0.10	42.00
12/20/24	K. Nixon	Draft complaint against borrower(s).	1.70	714.00
12/20/24	S. Kinsella	Meeting with counsel for project borrower (.5); phone call with CRO regarding the same and filed answers (1.1); analyze settlement proposals (.3); analyze remaining project borrower lawsuits (.9).	2.80	1,610.00
12/23/24	S. Kinsella	Analyze potential adversary proceedings.	0.40	230.00
12/26/24	S. Kinsella	Meeting with CRO (1.0); communications with potential conflicts counsel (.2).	1.20	690.00
12/26/24	K. Nixon	Meeting with CRO regarding asset analysis.	0.80	336.00
12/27/24	S. Kinsella	Provide instruction regarding pending adversary proceedings (.2); review financial information for project borrowers (.5).	0.70	402.50
12/30/24	S. Kinsella	Review orders for status conference (.1); communications with potential conflicts counsel (.1).	0.20	115.00
12/31/24	S. Kinsella	Prepare for additional adversary proceedings.	0.30	172.50
	Current Legal Fee	s:	55.10	\$ 27,792.00

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella	575.00	30.00	17,250.00
Katherine Nixon	420.00	25.10	10,542.00
Total		55.10	\$ 27,792.00

Invoice Totals

\$ 27,792.00 Total for Current Legal Fees:

\$ 27,792.00 **Total For Current Invoice:**

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Invoice: 1901812 January 6, 2025 Invoice Date:

Client Number: 097807 **Matter Number:** 097807.5002

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Asset Disposition

Total for Current Legal Fees:

\$ 504.00

Total For Current Invoice:

\$ 504.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Online Payments:

Wire Instructions:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Fredlaw.com/payment

Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice:

Invoice Date:

1901812 January 6, 2025

Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895308	756.00		756.00
	Total Prior Balance:			\$ 756.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of January 6, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1901812 Invoice Date:

January 6, 2025 **Client Number:** 097807 **Matter Number:** 097807.5002

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/11/24	K. Nixon	Draft motion to approve settlement with Friends of the Wave, LLC.	0.30	126.00
12/16/24	K. Nixon	Finalize motion to approve settlement with Friends of the Wave, email copy of the same to CRO, and provide Word versions of proposed orders for settlement motions to Court staff.	0.40	168.00
12/19/24	K. Nixon	Reply to email from court staff re: form order approving settlements and email CRO re: order approving HIE Depot settlement.	0.10	42.00
12/23/24	K. Nixon	Review orders approving settlement and send copies of the same to CRO.	0.20	84.00
12/27/24	K. Nixon	Emails re: status of Friends of the Wave settlement.	0.20	84.00
	Current Legal Fee	es:	1.20	\$ 504.00

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Katherine Nixon	420.00	1.20	504.00
Total		1.20	\$ 504.00
Invoice	Totals		

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Total for Current Legal Fees: \$ 504.00

Total For Current Invoice: \$ 504.00

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Invoice: Invoice Date: **Client Number:**

Matter Number:

1901813 January 6, 2025

097807 097807.5007

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Claims Administration and Objections

Total for Current Legal Fees:

\$84.00

Total For Current Invoice:

\$ 84.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Total For Current Invoice:

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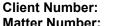


Invoice Date:

1901813

January 6, 2025 097807

\$84.00



Matter Number: 097807.5007

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Fredrikson

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/09/24	S. Stallings	Review claims docket and compile new claims and forward to M. Yenamandra.	0.40	84.00
	Current Legal F	ees:	0.40	\$ 84.00

Timekeeper Summary

Timekeeper	Bill Rate	<u>Hours</u>	Billed Amount
Shataia Stallings	210.00	0.40	84.00
Total		0.40	\$ 84.00
<u>Inv</u>	voice Totals		
Total for Current Legal Fees:			\$ 84.00

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Invoice: 1901814 Invoice Date:

January 6, 2025 **Client Number:** 097807 **Matter Number:** 097807.5010

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Employment and Fee Applications

Total for Current Legal Fees:

\$ 1,430.50

Total For Current Invoice:

\$ 1,430.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

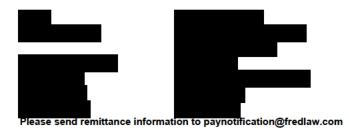
Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



Tax ID:

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Invoice: Invoice Date:

1901814 January 6, 2025



Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895309	1,457.00		1,457.00
	Total Prior Balance:			\$ 1,457.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of January 6, 2025. If payment has been sent close to this date, please verify payment status.

f 71 Invoice: 1901814

Invoice Date: January 6, 2025 Client Number: 097807 Matter Number: 097807.5010



EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/04/24	K. Nixon	Email CRO re: approval of committee fees.	0.10	42.00
12/10/24	K. Nixon	Draft fourth staffing report for CRO.	0.20	84.00
12/12/24	K. Nixon	Draft Fredrikson's fourth fee application.	1.10	462.00
12/16/24	S. Kinsella	Review and revise fee application.	0.10	57.50
12/16/24	K. Nixon	Email CRO re: Court approval of Fredrikson third fee application.	0.10	42.00
12/18/24	K. Nixon	Finalize Fredrikson fourth fee application and email CRO re: fourth staffing report.	0.30	126.00
12/21/24	S. Kinsella	Communications with potential conflict counsel.	0.10	57.50
12/23/24	S. Kinsella	Communications with potential conflicts counsel regarding adversary proceedings.	0.90	517.50
12/27/24	K. Nixon	Email CRO re: order granting UCC counsel's third fee app.	0.10	42.00
	Current Legal I	Fees:	3.00	\$ 1,430.50

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella	575.00	1.10	632.50
Katherine Nixon	420.00	1.90	798.00
Total		3.00	\$ 1,430.50

Invoice Totals

Total for Current Legal Fees: \$ 1,430.50

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Fredrikson

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Invoice: 1901814 Invoice Date: January 6, 2025

Page: 2

Total For Current Invoice: \$ 1,430.50

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Invoice: 1901815 January 6, 2025 Invoice Date:

Client Number: 097807 **Matter Number:** 097807.5012

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Financing and Cash Collateral

Total for Current Legal Fees: \$ 141.50

Total For Current Invoice: \$ 141.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.

Minneapolis, MN 55480-1484

P.O. Box 1484

Fredlaw.com/payment

Online Payments:

Wire Instructions:

Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Fredrikson

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Invoice: **Invoice Date:**

1901815 January 6, 2025

Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895310	975.00		975.00

Total Prior Balance: \$ 975.00

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Invoice: 1901815 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.5012

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/03/24	K. Nixon	Review third cash collateral order and email CRO re: the same.	0.20	84.00
12/03/24	S. Kinsella	Review order approving use of cash.	0.10	57.50
	Current Legal Fe	es:	0.30	\$ 141.50

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella Katherine Nixon	575.00 420.00	0.10 0.20	57.50 84.00
Total		0.30	\$ 141.50

Invoice Totals

Total for Current Legal Fees: \$ 141.50

Total For Current Invoice: \$ 141.50

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Filed 01/16/25 Entered 01/16/25 10:48:43 Desc Main



Invoice: 1901816

January 6, 2025 Invoice Date: **Client Number:** 097807 **Matter Number:** 097807.5013

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Meetings and Communications with Creditors

Total for Current Legal Fees:

\$356.00

Total For Current Invoice:

\$ 356.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Online Payments:

Wire Instructions:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Fredlaw.com/payment

Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Fredrikson

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Invoice: Invoice Date:

1901816 January 6, 2025

Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
11/04/24	1888543	57.50		57.50
12/05/24	1895311	1,882.00		1,882.00

\$ 1,939.50 **Total Prior Balance:**

\$ 356.00



Invoice: 1901816 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.5013

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	K. Nixon	Review email from committee re: requested tax information and respond accordingly.	0.10	42.00
12/02/24	S. Kinsella	Communications with Committee counsel regarding tax issue.	0.20	115.00
12/03/24	K. Nixon	Email CRO re: inquiry from creditor re: tax valuation information.	0.10	42.00
12/05/24	K. Nixon	Attention to inquiry from creditor re: valuation information.	0.10	42.00
12/17/24	S. Kinsella	Communications with creditor.	0.20	115.00
	Current Legal Fee	s:	0.70	\$ 356.00

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella Katherine Nixon	575.00 420.00	0.40 0.30	230.00 126.00
Total		0.70	\$ 356.00
Invoice Tota	als .		
Total for Current Legal Fees:			\$ 356.00

Total For Current Invoice:

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Invoice: Invoice Date:

1901817 January 6, 2025

Client Number: 097807 **Matter Number:** 097807.5018

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Reporting

Total for Current Legal Fees:

\$ 372.50

Total For Current Invoice:

\$ 372.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Fredrikson

Invoice: Invoice Date:

1901817 January 6, 2025

Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
09/05/24	1876154	7,565.50	(3,001.50)	4,564.00
12/05/24	1895313	582.50		582.50

Total Prior Balance: \$ 5,146.50



Invoice:

Invoice Date:

1901817 January 6, 2025

Client Number: **Matter Number:**

097807 097807.5018

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/18/24	S. Kinsella	Review monthly operating report.	0.10	57.50
12/18/24	K. Nixon	Attention to inquiry from CRO re: cash disbursements and MOR.	0.20	84.00
12/20/24	K. Nixon	Review November MORs.	0.20	84.00
12/20/24	S. Stallings	Attention to finalizing November monthly operating reports, e-file, and forward bank statements to UST.	0.70	147.00
	Current Legal Fee	s:	1.20	\$ 372.50

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella	575.00	0.10	57.50
Katherine Nixon	420.00	0.40	168.00
Shataia Stallings	210.00	0.70	147.00
Total		1.20	\$ 372.50

Invoice Totals

Total for Current Legal Fees: \$ 372.50

Total For Current Invoice: \$ 372.50

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Filed 01/16/25 Entered 01/16/25 10:48:43 Desc Main



Invoice: 1901800 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.0003

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary action against Preference 42, LLC

Total for Current Legal Fees: \$42.00

Total For Current Invoice: \$ 42.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.

Minneapolis, MN 55480-1484

P.O. Box 1484

Fredlaw.com/payment

Online Payments:

Wire Instructions:

Please send remittance information to paynotification@fredlaw.com

Tax ID:

^{**} Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.*

Fredrikson

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Invoice: Invoice Date:

1901800 January 6, 2025

Page:

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895302	168.00		168.00
	Total Prior Balance:			\$ 168.00

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Invoice:

Matter Number:

1901800

Invoice Date: January 6, 2025 **Client Number:**

097807 097807.0003



EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	K. Nixon	Finalize stipulation to extend time to answer complaint.	0.10	42.00
	Current Legal Fe	es:	0.10	\$ 42.00

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Katherine Nixon	420.00	0.10	42.00
Total		0.10	\$ 42.00
Invoice Totals			
Total for Current Legal Fees:			\$ 42.00
Total For Current Invoice:			\$ 42.00

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1901801 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.0004

Fredrikson

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against Boulevard Square

Total for Current Legal Fees:

\$871.00

Total For Current Invoice:

\$871.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Online Payments:

Fredlaw.com/payment

Wire Instructions:



Tax ID:

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Document

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Invoice: **Invoice Date:**

1901801 January 6, 2025

Page:

Fredrikson

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895303	84.00		84.00
	Total Prior Balance:			\$ 84.00

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Invoice: 1901801

Invoice Date: January 6, 2025 Client Number: 097807 Matter Number: 097807.0004

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	K. Nixon	Finalize stipulation to extend time to answer complaint.	0.10	42.00
12/06/24	S. Kinsella	Revise motion for default judgment.	0.20	115.00
12/06/24	K. Nixon	Draft default judgment motion.	1.30	546.00
12/09/24	K. Nixon	Attention to certificate of service for motion for default judgments.	0.10	42.00
12/09/24	S. Stallings	Prepare certificate of service regarding motion for default judgment against Boulevard Square II and IV.	0.20	42.00
12/23/24	K. Nixon	Review answer to complaint filed by Boulevard Square III, LLC and send copy of the same to CRO.	0.20	84.00
	Current Legal Fee	es:	2.10	\$ 871.00

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella	575.00	0.20	115.00
Katherine Nixon	420.00	1.70	714.00
Shataia Stallings	210.00	0.20	42.00
Total		2.10	\$ 871.00

Invoice Totals

Total for Current Legal Fees: \$871.00

Total For Current Invoice: \$871.00

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Invoice: 1901802 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.0005

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against Pioneer Place, LLC

Total for Current Legal Fees:

\$ 1.096.50

Total For Current Invoice:

\$1,096.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice: 1901802 Invoice Date:

January 6, 2025 Client Number: 097807 **Matter Number:** 097807.0005

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/05/24	S. Kinsella	Review motion for default judgment.	0.10	57.50
12/05/24	K. Nixon	Draft motion for default judgment.	2.00	840.00
12/09/24	K. Nixon	Attention to certificate of service for motion for default judgments.	0.10	42.00
12/09/24	S. Stallings	Prepare certificate of service regarding motion for default judgment against Pioneer Place.	0.20	42.00
12/31/24	S. Kinsella	Review judgment and order granting motion for default judgment (.1); send to client (.1).	0.20	115.00
	Current Legal Fee	s:	2.60	\$ 1,096.50

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella	575.00	0.30	172.50
Katherine Nixon	420.00	2.10	882.00
Shataia Stallings	210.00	0.20	42.00
Total		2.60	\$ 1,096.50

Invoice Totals

Total for Current Legal Fees: \$ 1,096.50

Total For Current Invoice: \$ 1,096.50

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Invoice: 1901803 Invoice Date:

January 6, 2025 **Client Number:** 097807 **Matter Number:** 097807.0006

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against SAD Downtown, LLC d/b/a The Firm

Total for Current Legal Fees: \$ 214.50

Total For Current Invoice: \$ 214.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Wire Instructions:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Fredlaw.com/payment

Online Payments:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice: **Invoice Date:**

1901803 January 6, 2025

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Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895304	336.00		336.00
	Total Prior Balance:			\$ 336.00



\$ 214.50



Invoice: 1901803 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.0006

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Total for Current Legal Fees:

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/02/24	K. Nixon	Finalize stipulation to extend time to answer complaint.	0.10	42.00
12/19/24	S. Kinsella	Review answer.	0.30	172.50
	Current Legal Fe	ees:	0.40	\$ 214.50

Timekeeper Summary

<u>Timekeeper</u>	Bill Rate	<u>Hours</u>	Billed Amount
Steven R. Kinsella Katherine Nixon	575.00 420.00	0.30 0.10	172.50 42.00
Total		0.40	\$ 214.50
Invoice Totals			

Total For Current Invoice: \$ 214.50

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Invoice Date: **Client Number: Matter Number:**

Invoice:

1901804 January 6, 2025

097807 097807.0007



EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against Greenfield Commons

Total for Current Legal Fees:

\$ 126.00

Total For Current Invoice:

\$ 126.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Wire Instructions:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Fredlaw.com/payment

Online Payments:

Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice: Invoice Date:

1901804 January 6, 2025

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Fredrikson

Prior Balance Due Detail

<u>Date</u>	Invoice Number	<u>Amount</u>	<u>Payments</u>	Balance Due
12/05/24	1895305	126.00		126.00
	Total Prior Balance:			\$ 126.00

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\$ 126.00



Invoice: 1901804 Invoice Date: January 6, 2025

097807 **Client Number: Matter Number:** 097807.0007

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	Description	<u>Hours</u>	<u>Amount</u>
12/02/24	K. Nixon	Finalize stipulation to extend time to answer complaint (0.1); emails to G. Singer re: the same (0.2).	0.30	126.00
	Current Legal Fees	s:	0.30	\$ 126.00

Timekeeper Summary

Timekeeper	Bill Rate	<u>Hours</u>	Billed Amount
Katherine Nixon	420.00	0.30	126.00
Total		0.30	\$ 126.00
<u> </u>	nvoice Totals		
Total for Current Legal Fees:			\$ 126.00

Total For Current Invoice:

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Invoice: 1901805 Invoice Date:

January 6, 2025 **Client Number:** 097807 **Matter Number:** 097807.0008

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against EPIC Holdings II

Total for Current Legal Fees:

\$ 126.00

Total For Current Invoice:

\$ 126.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice: 1901805

Invoice Date: January 6, 2025

Client Number: 097807 Matter Number: 097807.0008

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/18/24	K. Nixon	Attention to service of summons and complaint.	0.30	126.00
	Current Legal	Fees:	0.30	\$ 126.00
Invoice Totals				
	Total for Currer	nt Legal Fees:		\$ 126.00
	Total For Cu	urrent Invoice:		\$ 126.00

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Invoice: 1901806 Invoice Date: January 6, 2025

Client Number: 097807 **Matter Number:** 097807.0009

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against U of J MU Jamestown, LLC

Total for Current Legal Fees:

\$356.00

Total For Current Invoice:

\$ 356.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Fredlaw.com/payment

Online Payments:

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice: 1901806 Invoice Date:

January 6, 2025 **Client Number:** 097807 **Matter Number:** 097807.0009

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/11/24	S. Kinsella	Communications with defendant's counsel and send requested documents.	0.20	115.00
12/20/24	K. Nixon	Emails to defendant and CRO re: extension of answer deadline and requested information.	0.30	126.00
12/27/24	S. Kinsella	Review default notice.	0.10	57.50
12/31/24	S. Kinsella	Communications with defendant.	0.10	57.50
	Current Legal Fee	es:	0.70	\$ 356.00

Invoice Totals

Total for Current Legal Fees: \$ 356.00

Total For Current Invoice: \$ 356.00

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Invoice: 1901807 Invoice Date:

January 6, 2025 **Client Number:** 097807 **Matter Number:** 097807.0010

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against LTC - The Don, LLC

Total for Current Legal Fees:

\$ 147.00

Total For Current Invoice:

\$ 147.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Total For Current Invoice:

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Invoice:

Invoice Date:

January 6, 2025 097807 **Client Number: Matter Number:** 097807.0010

1901807

\$ 147.00



EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	
12/13/24	S. Stallings	Attention to finalizing and efiling adversary complaint.	0.30	63.00	
12/18/24	K. Nixon	Attention to service of summons and complaint.	0.20	84.00	
Current Legal Fees:			0.50	\$ 147.00	
Invoice Totals					
Total for Current Legal Fees:				\$ 147.00	

Fredrikson

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Invoice: 1901808 Invoice Date:

January 6, 2025 097807

Client Number: Matter Number: 097807.0011

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against 36th and Veterans, LLC

Total for Current Legal Fees:

\$ 147.00

Total For Current Invoice:

\$ 147.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484

Minneapolis, MN 55480-1484

Online Payments:

Fredlaw.com/payment

Wire Instructions:



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Tax ID:

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Total For Current Invoice:

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\$ 147.00



Invoice: 1901808

Invoice Date: January 6, 2025 097807 **Client Number: Matter Number:** 097807.0011

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	Description	<u>Hours</u>	<u>Amount</u>	
12/13/24	S. Stallings	Attention to finalizing and efiling adversary complaint.	0.30	63.00	
12/18/24	K. Nixon	Attention to service of summons and complaint.	0.20	84.00	
Current Legal Fees:			0.50	\$ 147.00	
<u>Invoice Totals</u>					
Total for Current Legal Fees:				\$ 147.00	

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Invoice: Invoice Date: **Client Number:**

Matter Number:

January 6, 2025 097807 097807.0014

1901809

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through December 31, 2024

Regarding: Adversary against EPIC Management, LLC

Total for Current Legal Fees:

\$84.00

Total For Current Invoice:

\$ 84.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A. P.O. Box 1484 Minneapolis, MN 55480-1484 Online Payments:

Fredlaw.com/payment

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID:

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Invoice: 1901809

Invoice Date: January 6, 2025

Client Number: 097807 Matter Number: 097807.0014

EPIC Companies Midwest, LLC Attn: Patrick Finn 900 Long Lake Rd, Suite 180 Lighthouse Management Group, Inc. New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/18/24	K. Nixon	Attention to service of summons and complaint.	0.20	84.00
Current Legal Fees:		0.20	\$ 84.00	
Invoice Totals				
Total for Current Legal Fees:				\$ 84.00
Total For Current Invoice:				\$ 84.00

UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re: Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,
Bankruptcy No. 24-30284
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors. Chapter 11

NOTICE OF FIFTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024

- TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)
- 1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its fifth application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.
- 2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Wednesday**, **February 6**, **2025**, **which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may deemed waived.

Dated: January 16, 2025 /e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400 Fargo, ND 58102-4991 701.237.8200 mraum@fredlaw.com

Steven R. Kinsella (#09514)
Katherine A. Nixon (*pro hac vice* MN #0402772) **FREDRIKSON & BYRON, P.A.**60 South 6th Street, Suite 1500
Minneapolis, MN 55402-4400
612.492.7000
skinsella@fredlaw.com

ATTORNEYS FOR DEBTORS

knixon@fredlaw.com